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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Taunya Shilling,)	Case No.: 2:24-CV-01521
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
vs.)	FOR AN EXTENSION OF TIME
Commissioner of Social Security,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 16, 2024, up to and including October 17, 2024. This is Defendant's first request for an extension.

Defendant requests this extension in order to further consider the administrative record in light of the issues raised in Plaintiff's motion. The undersigned has a number of competing deadlines in cases pending in this district and other districts.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: September 16, 2024

/s/ Andrew T. Koenig*

(*as authorized via e-mail on September 16, 2024)

ANDREW T. KOENIG

Attorney for Plaintiff

Dated: September 16, 2024

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

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By: /s/ Erin A. Jurrens

ERIN A. JURRENS

Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including October 17, 2024, to respond to Plaintiff's Motion for Summary Judgment.

DATED: September 16, 2024



ALLISON CLAIRE

UNITED STATES MAGISTRATE JUDGE